

REMARKS

Therefore claims 1-50 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Section 103(a) Rejection:

The Office Action rejected claims 39-50 under 35 U.S.C. § 103(a) as being unpatentable over Pulliam et al. (U.S. Patent 6,609,108) (hereinafter "Pulliam"). Additionally, claims 1-2, 4-5, 7-14, 16-27, 29-30 and 32-38 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Pulliam in view of Guyot et al. (U.S. Patent 6,119,098) (hereinafter "Guyot"). As set forth in more detail below, Applicants respectfully traverse the rejection as to the currently pending claims.

Regarding claim 39, Applicants assert that Pulliam fails to teach or suggest storing a set of information in a space by sending at least one message specified in a schema for the space. Pulliam teaches an online shopping communication schema for communication online shopping orders such as vehicle orders wherein "a consumer is provided real-time information, prior to the placement of an order or purchase by the consumer, regarding the availability and status of a configured product in relation to the product's manufacturing and delivery process or 'pipeline'." (Pulliam, column 2, lines 55-62). Pulliam teaches nothing regarding storing a set of information in a space by sending at least one message specified in a schema for the space.

The Examiner cites column 3, lines 52-67, where Pulliam describes a communication schema for an online ordering system that includes an order message used to send detailed vehicle configuration information for ordering. Pulliam's order message is used to place an online order, not to store a set of information in a space. The Examiner also cites column 7, lines 46-54, where Pulliam describes web page retrieval and presentation over the Internet using various technologies including, HTML, XML, ASP, Java Applets, etc., and further cites column 13, lines 19-67 that teaches how a client

or presentation application may submit search requests to find vehicles that match search criteria. None of the Examiner's cited passages nor any other portion of Pulliam teaches storing a set of information in a space by sending at least one message specified in a schema for the space. Instead, Pulliam teaches a schema for online purchasing messages (e.g. message to purchase a vehicle online).

Additionally, Pulliam also fails to teach wherein the set of information stored in the space is expressed in a data representation language. At the Examiner's cited passage (Pulliam, column 7, line 46-column 8, lines 5), Pulliam describes basic and standard web page retrieval and presentation over the Internet using various technologies including, HTML, XML, ASP, Java Applets, etc. However, Pulliam does not teach that these web pages are stored in a space by sending at least one message specified in a schema for the space. Pulliam specifically refers to consumers being able to enter and send information to servers and how such web pages serve as a multimedia user interface that interfaces between the users and the system. While the cited passage does mention that "[w]eb pages can be ... created using ... extensible markup language (XML)", Pulliam does not teach or suggest a set of information expressed in a data representation language that is stored in a space by sending at least one message specified in a schema for the space.

Furthermore, Pulliam does not teach or suggest a schema specifying a plurality of messages usable to invoke functions of the space. The Examiner admits that Pulliam fails to teach that the schema specifies a plurality of messages usable to invoke functions of the space, but notes that Pulliam does teach an online communication schema for communicating only vehicle orders and citing column 3, lines 29-39 of Pulliam. Applicants fail to see the relevance of the Examiner's reference to Pulliam's on line ordering communication schema. Pulliam's schema does not specify a plurality of messages usable to invoke functions of the space. In contrast, Pulliam teaches that a customer "submits a new order 1200 to a web site 602, which is constructed as an interface between the vehicle manufacturer and the customers." (Pulliam, column 19, lines 37-40). Thus, Pulliam is clearly not teaching a schema that specifies a plurality of messages usable to invoke functions of a space, as the Examiner contends, but instead is

teaching messages sent to a web site that is an interface for vehicle manufacturers to receive orders from customers. Applicants fail to see the relevance of Pulliam's vehicle ordering messages to a schema that specifies a plurality of messages usable to invoke functions of a space.

Further, Applicants disagree with the Examiner statement that "[i]t would have been obvious to apply the teaching of Pulliam for 'the schema specifies a plurality of messages usable to invoke functions of the space' in order to provide a means for efficiently delivering the desired service to the customer, and minimizing the risk that the customer will become inconvenienced and dissatisfied with the merchant's on-line ordering services." Pulliam describes a very detailed system for providing online vehicle ordering capabilities and does not suggest any need or benefit to storing a set of information in a space by sending at least one messages specified in a schema for the space, wherein the schema specifies a plurality of messages usable to invoke functions of the space. In fact, Applicants can find no reference in Pulliam teaching or suggesting any benefit to modifying Pulliam that would result in a method comprising storing a set of information in a space by sending at least one messages specified in a schema for the space, wherein the schema specifies a plurality of messages usable to invoke functions of the space" as the Examiner contends. No efficiencies of risk minimization would be achieved in Pulliam's system by storing a set of information in a space by sending at least one messages specified in a schema for the space that specifies a plurality of messages usable to invoke functions of the space. The Examiner is clearly relying upon hindsight analysis to arrive at such a conclusion.

Applicants also submit that Pulliam fails to teach the client retrieving the set of information expressed in the data representation language from the space by sending at least one of the messages specified in the schema for the space. The Examiner cites passages in Pulliam (column 3, line 52 – column 4, line 10, column 13, lines 19-67, and column 16, lines 6-12) that describe the use of XML messages for vehicle orders, vehicle order confirmations, and for available vehicle searches. However, Applicants assert that receiving order confirmation messages and search results is not a client retrieving the set

of information expressed in the data representation language from the space by sending at least one of the messages specified in the schema for the space. Following the Examiner's line of argument, the data included in an order confirmation (or in a search results message) would have to have been stored by sending at least on message specified in a schema for the space. This is clearly not the case in Pulliam. In contrast, Pulliam teaches that such information (for orders or searches) is retrieved from inventory database 322 and that inventory importer 328 "is responsible for obtaining the relevant data from one or more sources, reformatting the data as necessary, and storing the data in the inventory database 322." (Pulliam, column 8, lines 25-44). In other words, the data returned as search results and order confirmations is retrieved from an inventory database built by an inventory importer using information gathered from various sources – and therefore not stored by sending a message specified in a schema for the space. Thus, Pulliam fails to teach a client retrieving the set of information expressed in the data representation language from the space by sending at least one of the messages specified in the schema for the space.

Thus, in light of the above remarks, Applicants assert that the rejection of claim 39 is not supported by the cited art and withdrawal of the rejection is respectfully requested. Similar remarks as discussed above in regard to claim 39 apply to claims 43 and 47.

Regarding claim 42, Pulliam fails to teach wherein the schema is expressed in the data representation language. In contrast, Pulliam, at the Examiner's cited passage (column 7, lines 46-61), describes basic and standard web page retrieval and presentation over the Internet using various technologies including, HTML, XML, ASP, Java Applets, etc. Pulliam specifically refers to consumers being able to enter and send information to servers and how such web pages serve as a multimedia user interface that interfaces between the users and the system. Pulliam teaches that XML is used to describe the content of messages, not to specify the messages themselves. Applicants can find not teaching anywhere in Pulliam regarding wherein a schema is expressed in a data representation language.

Thus, in light of the above remarks, Applicants assert that the rejection of claim 42 is not supported by the cited art and withdrawal of the rejection is respectfully requested. Similar remarks as discussed above in regard to claim 42 apply to claims 46 and 50.

Further regarding claim 1, the Examiner admits that Pulliam fails to teach wherein the space is operable to store one or more service advertisements and each of the service advertisements comprises information which is usable to access a corresponding service. Applicants disagree, however, with the Examiner regarding the teaching of Guyot. Applicants assert that Guyot fails to teach wherein the space service is operable to store one or more service advertisements and each of the service advertisements comprises information which is usable to access a corresponding service.

Guyot teaches a system for targeting and distributing commercial advertisements for marketing products over a distributed information network wherein a client application displays targeted consumer advertisements on a subscriber's computer. The commercial marketing advertisements in Guyot have nothing to do with service advertisements that comprise information usable by a client to execute corresponding services. In Guyot, a server manages the advertisements that are specifically targeted to the subscriber based on a personal profile of the subscriber. The client application periodically accesses the server to download and display advertisements. The Examiner's cited passage (Guyot, column 3, line 23 – column 4, line 14) describes an advertisement database that "preferably includes Subscriber Data, Advertiser Data, Advertisement Data, Subscriber Statistics, and Client Application Software Data." (Guyot, column 3, lines 55-57). Thus, Guyot has nothing to do with a space that is operable to store one or more service advertisements, wherein each of the service advertisements comprises information which is usable to access a corresponding service. Hence, both Pulliam and Guyot, whether singly or in combination, fail to teach or suggest a space operable to store one or more service advertisements and each of the service advertisements comprises information which is usable to access a corresponding service.

Applicants further argue that the combination of Pulliam and Guyot would result in the vehicle ordering system of Pulliam wherein consumer targeted advertisements would be displayed while a client is browsing or ordering vehicles. Such a combination (of Pulliam and Guyot) would clearly is not relevant to Applicants' claimed invention and does not teach or suggest a space operable to store one or more service advertisements and each of the service advertisements comprises information which is usable to access a corresponding service.

Further regarding claim 1, Applicants also submit that neither Pulliam, nor Guyot teach wherein the space service is configured to provide functions to manage or access the one or more service advertisements in the space, wherein the functions of the space service are invoked according to the schema for the space service which specifies one or more messages for invoking functions of the space service. Instead, Pulliam describes a communication schema for an online ordering system that includes an order message used to send detailed vehicle configuration information for ordering. (Pulliam, column 3, lines 52-67). Guyot teaches the use of several commands, such as TAKESTAT, SENDAD, and TAKEACT commands for the client application to interact with the commercial advertisement database. (Guyot, column 8, line 52 – column 9, line 17) Nowhere does Guyot describe these commands as functions to manage or access service advertisements in a space service, nor where these commands are invoked according to a schema for the space service that specifies one or more message for invoking functions of the space service.

Additionally, neither Pulliam nor Guyot teaches a client using the information from the selected service advertisement to execute the corresponding service.

Thus, in light of the above remarks, Applicants assert that the rejection of claim 1 is not supported by the cited art and withdrawal of the rejection is respectfully requested. Similar remarks as discussed above in regard to claim 1 apply to claims 14 and 26.

Regarding claim 4, Applicants disagree with the Examiner's interpretation of Pulliam and assert that Pulliam fails to teach wherein the schema is expressed in a data representation language. In contrast, Pulliam, at the Examiner's cited passage (column 7, lines 46-61), describes basic and standard web page retrieval and presentation over the Internet using various technologies including, HTML, XML, ASP, Java Applets, etc. Pulliam specifically refers to consumers being able to enter and send information to servers and how such web pages serve as a multimedia user interface that interfaces between the users and the system. Pulliam teaches that XML is used to describe the content of messages, not to specify the messages themselves. Applicants can find not teaching anywhere in Pulliam regarding wherein a schema is expressed in a data representation language.

Further, Guyot additionally fails to teach wherein the schema is expressed in a data representation language. Guyot teaches the use of several commands, such as TAKESTAT, SENDAD, and TAKEACT commands for the client application to interact with the advertisement database. (Guyot, column 8, line 52 – column 9, line 17). However, Applicants can find no mention in Guyot of a data representation language or any description whatsoever regarding the format of these messages.

Thus, both Pulliam and Guyot, singly and in combination, fail to teach wherein a schema is expressed in a data representation language.

Thus, in light of the above remarks, Applicants assert that the rejection of claim 4 is not supported by the cited art and withdrawal of the rejection is respectfully requested. Similar remarks as discussed above in regard to claim 4 apply to claims 10 and 17.

Regarding claim 8, Applicants assert that Pulliam in view of Guyot fails to teach the client searching the one or more services stored in the space. Pulliam, at the Examiner's cited reference (column 13, lines 20-42) describes how a applications may submit search requests "to find vehicles in-process and at dealership which match ... the search criteria" and how such a search may include the use of pull-down lists of make or

model of a available vehicles. Thus, contrary to the Examiner's contention, Pulliam does not teach a client searching services stored in a space, but rather client applications searching for available vehicles from an "inventory database 612" (Pulliam, column 13, lines 58 – 61). Guyot also fails to teach a client searching the one or more services stored in the space. Instead, Guyot teaches a client application downloading and displaying specifically targeted consumer advertisements (Guyot, column 1, line 66 – column 2, line 6). Applicants disagree with the Examiner interpretation of Guyot and submit that Guyot, in fact, does not teach one or more service advertisements. The Examiner's cited passage (Guyot, column 3, line 23 – column 4, line 14) describes an advertisement database that preferably includes Subscriber Data, Advertiser Data, Advertisement Data, Subscriber Statistics, and Client Application Software Data.

Thus, Applicants assert that the combination of Pulliam, in view of Guyot, also fails to teach the client accessing the space service comprises the client searching the one or more service advertisements stored in the space. Applicants assert that in light of the above remarks the rejection of claim 8 is not supported by the cited art and withdrawal of the rejection is respectfully requested.

Applicants also assert that numerous other ones of the dependent claims recite further distinctions over the cited art. However, since the independent claims have been shown to be patentably distinct, a further discussion of the dependent claims is not necessary at this time.

CONCLUSION

Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5181-67400/RCK.

Also enclosed herewith are the following items:

- ☒ Return Receipt Postcard
- ☐ Petition for Extension of Time
- ☐ Notice of Change of Address
- ☐ Fee Authorization Form authorizing a deposit account debit in the amount of \$
for fees ().
- ☐ Other:

Respectfully submitted,


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